

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

BOOZ ALLEN HAMILTON HOLDING
CORP., *et al.*,

Defendants.

Civil Action No. 1:22-cv-01603-CCB

**PLAINTIFF’S MOTION FOR EXPEDITED BRIEFING AND SCHEDULING OF A
HEARING ON PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION**

Plaintiff hereby moves pursuant to Federal Rule of Civil Procedure 6(c)(1), Local Civil Rule 105.2, and the Court’s inherent power to manage its docket, for an order establishing a briefing schedule on Plaintiff’s Motion for Preliminary Injunction so that briefing can be completed and a hearing held on or before August 5, 2022.

Absent action on this motion, under the Local Rules, Defendants’ Response to the Motion would be due on July 22 and Plaintiff’s Reply on August 4, 2022.

However due to the need to address this matter prior to the deadline for submissions on the NSA contract, Plaintiff is seeking expedited briefing of its motion. Plaintiff requests an order requiring Defendants to file any response to Plaintiff’s Motion for a Preliminary Injunction on or before **Friday, July 22, 2022**, and requiring Plaintiff to file any reply on or before **Monday, August 1, 2022**.

In addition, Plaintiff asks that the Court set a hearing on the Plaintiff's Motion for a Preliminary Injunction no later than **Friday, August 5, 2022**. Plaintiff intends to offer to meet and confer with Defendants about limited discovery that may be necessary before the hearing.

This schedule is necessary and in the interest of justice based on the urgency of the issues and the importance of preserving competition for the sale of signals intelligence modeling and simulation services to NSA through the OPTIMAL DECISION contract, as set forth in both the Complaint (ECF no. 1) and the Memorandum in Support of the Motion for a Preliminary Injunction (ECF no. 29-1, at pp. 30-33).

Of particular relevance to Plaintiff's request, the NSA intends to issue its Request for Proposal for the OPTIMAL DECISION contract imminently. Once the NSA issues the RFP, Defendants must submit their proposals within forty-five days. A ruling from this Court on Plaintiff's Motion for Preliminary Injunction is necessary as soon as possible in order to preserve competition for the sale of signals intelligence modeling and simulation services to NSA through the OPTIMAL DECISION contract and restore Defendants' incentives to compete aggressively for OPTIMAL DECISION. Further, the above briefing and hearing schedule, which gives Defendants same time as would be permitted under LR 105.2, would not harm Defendants in any way.

For the foregoing reasons, Plaintiff respectfully requests that this Court enter an order requiring Defendants to file any response to Plaintiff's motion on or before Friday, July 22, 2022; requiring Plaintiffs to file any reply on or before Monday, August 1, 2022; and scheduling a hearing on the Plaintiff's Motion for a Preliminary Injunction no later than Friday, August 5, 2022.

Date: July 10, 2022

Respectfully submitted,

EREK L. BARRON
United States Attorney

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2022, I electronically filed the foregoing Motion for a Preliminary Injunction with the Clerk of Court using the CM/ECF system, and served one copy, by ECF to counsel of record in this matter.

/s/

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